

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BRANDON PERRONE,

Plaintiff,

07 Civ. 6496 (GBD)

-against-

**COMMERCIAL ELECTRICAL CONTRACTORS,
et al. and PEDRO CASTRO,**

**PLAINTIFF'S
ANSWER TO
DEFENDANTS'
COUNTERCLAIMS**

Defendants.
-----X

Plaintiff BRANDON PERRONE ("PLAINTIFF" or "PERRONE") by and through his attorneys SERRINS & ASSOCIATES, LLC, for his answer to Defendants COMMERCIAL ELECTRIC CONTRACTORS, et al., (herein referred to as "Commercial Electrical Contractors of New York" or "CECNY") and PEDRO CASTRO ("CASTRO" or "DEFENDANTS" collectively) as follows:

ANSWER

1. Plaintiff denies the allegations set forth in Paragraph 42 of the Counterclaims.
2. Plaintiff denies the allegations set forth in Paragraph 43 of the Counterclaims.
3. Plaintiff denies the allegations in Paragraph 44 of the Counterclaims and denies that Defendant Castro is entitled to the relief demanded, or any relief whatsoever.
4. Plaintiff denies the allegations set forth in Paragraph 45 of the Counterclaims and denies that he is liable to Defendant Castro for any monetary damages whatsoever.

AFFIRMATIVE DEFENSES TO DEFENDANTS' COUNTERCLAIMS

5. Defendants' Counterclaims fail, in whole or in part, to state a claim upon which relief can be granted.

RESERVATION OF RIGHTS

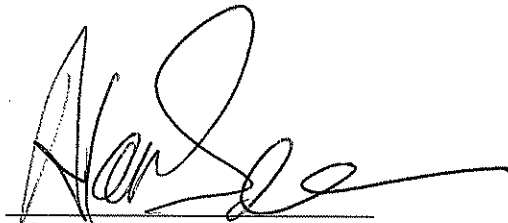
Plaintiff reserves the right to assert additional affirmative defenses as Defendants' counterclaims are clarified in the course of this litigation.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment:

- (a) dismissing Defendants' counterclaims in their entirety;
- (b) awarding Plaintiff his reasonable attorneys' fees and costs; and
- (c) granting such other and further relief as the Court deems necessary and proper.

Dated: December 3, 2007
New York, New York



Alan Serrins, Esq.
Ann Macadangdang, Esq
Serrins & Associates, LLC
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Attorneys for Plaintiff
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TO:

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Filippatos PLLC
60 East 42nd Street, 46th Fl.
New York, NY 10165
Attorneys for Defendants
(212)682-2400

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
)S.S.:
COUNTY OF NEW YORK)

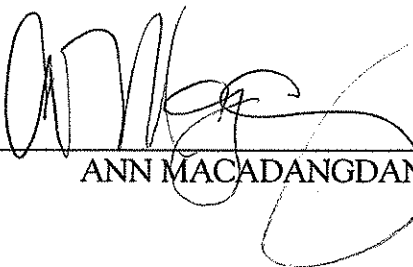
Ann Macadangdang, being duly sworn deposes and says:

I am not a party to this action, am over 18 years of age and reside in Kings County, New York. That on the 3rd Day of December, 2007 I served a true copy of the annexed

Answer to Defendants' Counterclaims on

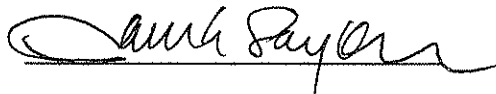
Parisis G. Filippatos, Esq.
FILIPPATOS PLLC
60 East 42nd Street - 46th Floor
New York, NY 10165

who agreed to accept service on behalf of Defendants Commercial Electric Contractors and Pedro Castro at the address designated by said attorney(s) for that purpose by depositing a true copy of same enclosed in a postpaid, properly addressed wrapper, via First Class Mail within the State of New York.



ANN MACADANGDANG

Sworn to before me on
the 3rd day of December, 2007



NOTARY PUBLIC

LAURA SAYAR
Notary Public, State of New York
No. 01sa6046419
Qualified in Kings County
Commission Expires 8/14/2010 